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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

February 14, 1995

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW - Room 222
Washington, DC 20554

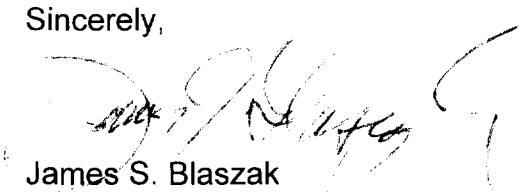
Dear Mr. Caton:

RE: Ex-Parte Written Presentation
CC Docket No. 92-237

Pursuant to Section 1.1206 of the Commission's Rules, attached please find an original and one copy of the written presentation of the Ad Hoc Telecommunications Users Committee ("Ad Hoc Committee") in the above referenced proceeding. Please date stamp the additional copy and return it with our messenger.

If you have any questions regarding this filing, please do not hesitate to call us.

Sincerely,


James S. Blaszak
Counsel for Ad Hoc Telecommunications
Users Committee

cc: Kathleen Wallman, Common Carrier Bureau
International Transcription Service

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February 14, 1995

Ms. Kathleen M. H. Wallman
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: Ex parte contact in CC Docket No. 92-237

Dear Ms. Wallman:

The Ad Hoc Telecommunications Users Committee (Ad Hoc Committee), as perhaps the most prominent representative of large corporate telecommunications users, has consistently urged the Commission to adopt policies and take steps which would maximize the likelihood of the entire telecommunications marketplace becoming effectively competitive. Most recently the Ad Hoc Committee has focused on the local exchange and access service markets.

Several number administration matters strongly suggest that the Commission should accelerate the pace at which it is addressing numbering issues. The Commission recently reversed Ameritech's attempt to require new wireless applications to use overlay area codes. *Proposed 708 Relief Plan and 630 Numbering Plan Area Code by Ameritech-Illinois*, FCC 95-19, released January 23, 1995. By letter of February 8, 1995, counsel for MFS Communications Company, Inc. (MFS) explained to the Commission that the Regional Bell Holding Companies appear to be using their control over Bellcore to perhaps improperly influence the selection of an entity to operate the 800 Service Management System (SMS). MFS understandably has expressed concern about the manner in which local number portability systems might be operated by the RBHCs in light of the RBHCs refusal to date to remove themselves from the

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selection process for the 800 SMS data center. MFS urges the Commission to use its, "... good offices to encourage the BOCs and Bellcore to restructure the [800 SMS] procurement to avoid even the appearance of self-dealing; and, if such efforts are unsuccessful, to take formal action to require the BOCs to transfer actual control of the SMS/800 system operations to a third-party administrator as originally proposed in the March 1992 implementation plan filed with the FCC." February 8, 1995 letter to James D. Schlichting from Andrew D. Lipman and Russell M. Blau.

The Ad Hoc Committee urges the Commission to assume a more active role than it appears to have taken to date with respect to number administration matters. The Ad Hoc Committee is on record in CC Docket No. 92 - 237 advocating a neutral administration of the North American Numbering Plan. The manner in which the RBHCs and Bellcore have handled the 800 SMS procurement process seems to underscore the need for Commission action to assure neutral administration of numbering administration functions. The North American Numbering Plan is every bit as much a bottleneck as certain local exchange carrier functions. The Commission in the interest of competition required equal access, nondiscriminatory access charges and some (albeit insufficient) unbundling of local exchange carrier functionalities in the guise of ONA. True local number portability will almost certainly be a prerequisite for local exchange service competition. Currently, the RBHCs and Bellcore are in absolute control of the technological evolution that is necessary for local number portability. They set resource allocation and contracting priorities, and select the vendors who will develop and deploy the local number portability technology. The RBHCs and Bellcore are in the position to use their sole control over number administration and related issues to retard the development of effective competition in the local market. Prompt Commission action is needed.

In the interest of promoting fair and effective competition in all sectors of the telecommunications market, the Ad Hoc Committee urges the Commission to act promptly in its North American Numbering Plan Administration docket (CC Docket No. 92 - 237) and to intervene in the 800 SMS contracting process to assure its neutrality.

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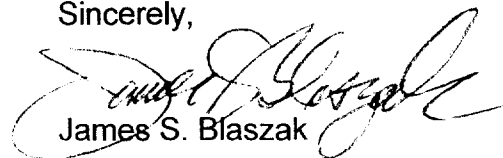
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The Commission should not put number issues on the regulatory backburner while it handles other matters. Delay could retard emergence of competition in the access service and local exchange service markets.

Sincerely,

A handwritten signature in black ink, appearing to read "James S. Blaszak", written over a horizontal line.

James S. Blaszak